



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

Via Electronic Mail

AUG 11 2015

Mr. Christopher Cannon
Director of Environmental Management
City of Los Angeles Harbor Department
Environmental Management Division
425 South Palos Verdes Street, San Pedro, CA 90731

Re: Submittal of Remedial Action Work Plan for Remediation of Soils Containing Polychlorinated Biphenyls (PCBs) within a Former PCB-remediation Area, San Pedro, CA.

Dear Mr. Cannon,

Thank you for working with the U.S. Environmental Protection Agency Region 9 (USEPA) to address the disposal of polychlorinated biphenyls (PCB) found at the former remediation area located along the north side of Front Street, northeast of the intersection of Front Street and North Pacific Avenue in San Pedro, CA (Site). USEPA has received and reviewed the City of Los Angeles, Harbor Department's April 8, 2015 *Remedial Action Work plan Former PCB Remediation Site Front Street Beautification Corridor Project San Pedro, CA 90731* (work plan) prepared by The Source Group Inc. (SGI) which outlines the Harbor Department's PCB remediation, disposal, and verification plan for soils and concrete on the Site.

This work plan describes the dig and haul process and subsequent disposal at a Toxic Substance Control Act (TSCA) permitted Facility. The Site is located mostly within a larger planned project area, known as the Front Street Beautification Corridor Project (Corridor Project). The Corridor Project will be redeveloping the site into a park. Based on the redevelopment, the Harbor Department will remediate the Site to meet the USEPA's Regional Screening Level of $\leq .24$ ppm (mg/kg) total PCBs. The Site will be completed in two phases. Phase 1 will be the remediation of the site to support the redevelopment of a portion of the Site into a park in accordance with Corridor Project. Phase 2 will consist of a plan to address PCBs found under a railway located on the north end of the Site which is not part of the redevelopment project. A fence will be put into place to prevent access to the north end of the Site from the redevelopment area. Best Management Practices shall be employed, if necessary, to prevent any migration of PCBs onto the park during and after the redevelopment. USEPA is approving the Harbor Department's Phase 1 work plan with conditions under 40 CFR 761.61(c) (risk-based disposal approval). The Harbor Department shall implement the work plan as modified by the conditions listed below.

A. USEPA Conditions of Approval and Additional Comments

- 1. Section 2.2 Soil and Concrete Removal.** The Site contains an underground pipe tunnel. The tunnel base and floor have been sampled and are addressed in the work plan and characterization report. The sidewalls were not characterized for disposal due to the inability to access them for sampling. The Harbor Department is submitting an addendum to address the side walls. The addendum will allow the Harbor Department to characterize the side walls for disposal or re-use. If the side walls are below the action level of .24 ppm (mg/kg) total PCBs the Harbor

Department shall leave the walls in place or crush and use it as backfill. If the concrete is greater than .24 ppm (mg/kg) total PCBs, the Harbor Department shall dispose of the concrete side walls as PCB remediation waste in accordance with their work plan.

2. **Section 2.3 Confirmation sampling.** The Harbor Department shall perform confirmation sampling in accordance with 40 CFR 761.61(a)(6).
3. **PCB Cleanup Waste Disposal.** Cleanup waste (e.g. personal protective equipment, rags, gloves, booties) shall be disposed of in accordance with 40 CFR 761.61(a)(5)(v). The disposal of all waste shall be in accordance with all federal, state, and local regulations.
4. **Equipment Decontamination.** The Harbor Department shall decontaminate non-disposable sampling tools and equipment, as well as movable equipment used during cleanup and/or additional sampling in accordance with 40 CFR 761.79(c)(2). Decontamination of sample equipment and tools must be conducted each time samples are collected to prevent cross-contamination. Decontamination residues must be disposed of at their original concentration in accordance with the requirements in 40 CFR 761.79(g). Recordkeeping of the decontamination events must be maintained in accordance with the requirements in 40 CFR 761.79(f)(2). These procedures must be implemented in a manner that is protective of human health and the environment consistent with the requirements in 40 CFR 761.79(e). The Harbor department shall perform a minimum of one (1) wipe sample per day to verify efficacy of decontamination processes.
5. **PCB Disposal Completion Report.** Within 60 days after work is complete, the Harbor Department shall submit a PCB disposal completion report for USEPA approval under 40 CFR 761.61(c). The report shall include all relevant data and justification demonstrating that the work completed is consistent with this approval. The Harbor Department must provide at a minimum all reporting requirements in 40 CFR 761.61(a)(9), and 40 CFR 761.125(c)(5). The Harbor Department shall also include figures, surveys or GPS coordinates depicting the location and results for all site characterization samples, verification samples and any PCBs left under the cap.

This Approval does not relieve the owner, the City of Los Angeles Harbor Department from complying with all other applicable federal, state, and local regulations and permits. Departure from the conditions of the Approval without prior written permission from USEPA may result in the commencement of proceedings to revoke this Approval, and/or an enforcement action. Nothing in this Approval bars USEPA from imposing penalties for violations of this approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this Approval.

This approval only applies to the planned project area, known as the Front Street Beautification Corridor Project (Corridor Project) located along Front Street and North Pacific Avenue in San Pedro, California. USEPA reserves the right to require additional characterization and/or cleanup of PCBs at the site if new information during additional site characterization, cleanup verification, and/or during future post-cleanup activities (e.g., redevelopment and post redevelopment) at the property shows that PCBs remain at the site above the approved PCB cleanup level. In addition, USEPA may require

cleanup in areas immediately adjacent to the site if those areas are found to be impacted by PCBs from the site.

USEPA appreciates the opportunity to assist the City of Los Angeles Harbor Department on the PCB disposal to be conducted at their facility in San Pedro, California. If you have any questions regarding this Approval please contact George Randell at 415.972.3439. Thank you for your cooperation.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jeff Scott", with a long horizontal flourish extending to the right.

for Jeff Scott, Director
Land Division

Cc Via Electronic Mail Only

Heloise Froelich-Port of Los Angeles
HFroelich@portla.org

George Randell-USEPA R9
Randell.george@epa.gov